

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

<b>In re:</b>	)	
	)	
<b>JAMES MOORE,</b>	)	<b>Chapter 13</b>
	)	<b>Case No. 13-11325</b>
<b>Debtor.</b>	)	
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<b>JAMES MOORE,</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Adversary Proceeding No. 14-01011</b>
	)	
<b>COMENITY CAPITAL BANK, and its agent,</b>	)	
<b>QUANTUM3 GROUP LLC,</b>	)	
	)	
<b>Defendants.</b>	)	
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**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS**

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Plaintiff, James Moore respectfully responds to the Defendant's Motion to Dismiss and asserts that the Motion should be denied based upon the facts and law referenced in Plaintiff's Brief.

Pursuant to E.D. Tenn. LBR 7007-1(a), the Plaintiff requests a hearing on the Motion pending and the response thereto.

Respectfully submitted,

RICHARD BANKS & ASSOCIATES, P. C.



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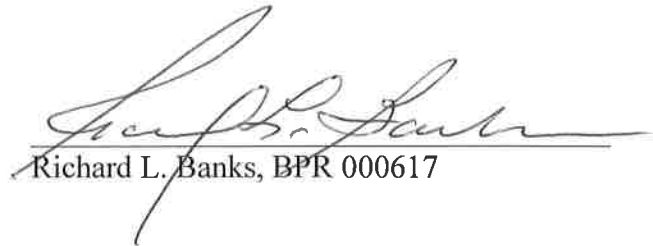
**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was filed electronically and served by first class mail and /or by the Court's Electronic Filing Notice to the parties listed below:

Victoria A. Ferraro, Esq.  
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*Attorney for Defendants*

Kara West  
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Gwendolyn Kerney  
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